



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Implement
the Commission's Procurement Incentive
Framework and to Examine the Integration
of Greenhouse Gas Emissions Standards
into Procurement Policies.

R.06-04-009
(Filed April 13, 2006)

**RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES
TO PETITION OF SOUTHERN CALIFORNIA EDISON COMPANY
FOR MODIFICATION OF DECISION 07-01-039**

DIANA L. LEE
Staff Counsel
Attorney for the Division of Ratepayer
Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-4342
Fax: (415) 703-2262

CHRISTINE S. TAM
Regulatory Analyst for the Division of
Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 355-5556
Email: tam@cpuc.ca.gov

February 27, 2008

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I. INTRODUCTION

Pursuant to Rule 16.4(f) of the Commission's Rules of Practice and Procedure, the Division of Ratepayer Advocates (DRA) submits this response to the petition of Southern California Edison Company (SCE) to modify Decision (D.) 07-01-039, the decision that adopted an interim greenhouse gas (GHG) Emissions Performance Standard (EPS). The EPS established a minimum performance standard for new long-term financial commitments to baseload generation undertaken by load-serving entities (LSEs).¹ The petition for modification (PFM) of D.07-01-039, filed January 28, 2008 and amended on February 12, 2008² seeks to limit the applicability of the EPS established in D.07-01-039 (Decision) in a manner that SCE contends is consistent with the intent of the Decision.

¹ D.07-01-039, pp. 1-2.

² The Amended PFM did not change the deadline for comments. *See* February 20, 2008 email from Administrative Law Judge Yip-Kikugawa to the service list.

DRA agrees that the relief requested in the PFM appears justified under the circumstances described by SCE, but does not support the modification of the language of D.07-01-039 proposed by SCE. SCE proposes a broad exemption to the EPS for any contributions required by existing contracts in effect on January 25, 2007. Rather than granting the requested blanket exemption, DRA instead recommends that the Commission consider requests for exemptions from the EPS on a case-by-case basis. Requests should be justified by documents similar to those provided by SCE, including the ownership and operating agreements of the facilities for which the exemption is requested, and information about the cost and impact of the financial contributions required under the ownership agreements. Considering relief on a case-by-case basis would allow the Commission to review requests to avoid the requirements of the EPS and to grant them only if they are justified under the circumstances.

II. DISCUSSION

Decision 07-01-039 implemented an EPS, consistent with the requirements of Senate Bill (SB) 1368, in order to “reduce California’s financial risk exposure to the compliance costs associated with future GHG emissions (state and federal) and associated future reliability problems in electricity supplies.”³ The EPS was designed to ensure that new investments complied with the EPS in order to prevent “backsliding.” The Decision carefully considered the types of generation and financial commitments to which the EPS should apply (“covered procurements”) and concluded that ongoing investments in an LSE’s own existing, non-combined cycle gas turbine (CCGT) baseload power plants generally need not comply with the EPS.⁴

However, consistent with the goal of preventing backsliding, the following new investments in existing utility power plants trigger compliance with the EPS:

(1) investments designed and intended to extend the life of one more units by five years or more, (2) investments that result in a net increase in the rated capacity of the power

³ D.07-01-039, p. 2.

⁴ *Id.*, pp. 50-52.

plant, or (3) investments designed and intended to convert a non-baseload plant to a baseload plant.⁵ All three of these situations would represent an effective increase in the amount of power procured, and it would therefore contravene the intent to “prevent backsliding” to exempt such investments from the EPS. Thus, the Decision balanced the need to protect ratepayers from the risks associated with new investments in high-emitting facilities with the costs and reliability problems that would result if existing facilities were rendered unusable by application of the EPS.⁶

A. Under the circumstances described in the PFM, DRA supports the request to exempt the Four Corners Agreement from the EPS.

SCE has a 48% ownership interest in Units 4 and 5 of the Four Corners Generating Station (Four Corners), a coal-based generation plant located near Farmington, New Mexico. SCE’s PFM and the accompanying excerpt from the Four Corners Operating Agreement state that SCE is contractually obligated to fund capital investments in Units 4 and 5 of Four Corners.⁷ According to SCE, if it fails to make such capital investments, SCE customers would lose the right to 720-750 MW⁸ of power, but would remain liable for costs of the required improvements.⁹ SCE estimates that the cost to its customers of failing to make the capital improvements required by the Four Corners operating agreement could be “close to \$220 million or more per year

⁵ D.07-01-039, p. 7.

⁶ *Id.*, Finding of Fact 220(c), p. 263 (One of the ways that the Commission considered reliability and costs to consumers was “ By not subjecting the millions of dollars in the LSE’s already-built facilities to a standard that is being developed to prevent backsliding in LSE decisions made for future investments.)

⁷ PFM pp. 2-3 and Genao Declaration, Exhibit A, Section 15.3 of “Four Corners Project Operating Agreement,” Revision 12, p. 61 (Each Participant shall be obligated for expenditures incurred for authorized Capital Additions, Capital Betterments, and Capital Replacements in the same percentage of its percentage ownership therein....).

⁸ PFM, pp. 6, 9.

⁹ PFM, p. 3, and Genao Declaration, Exhibit B, Section 20.5 of the Four Corners Co-Tenancy Agreement, Revision 6, p. 43.

depending on market conditions.”¹⁰ SCE states the Four Corner Agreements have been in place for nearly 42 years and will expire in 2016.¹¹

Based on the excerpts from the Four Corners agreements and distributed testimony of SCE witnesses Phelan and Ware,¹² it appears that SCE is required to make contributions capital improvements to Four Corners, or face liability for failure to make such contributions. Those contributions will “arguably extend the life of [Four Corners] by at least five years.”¹³ If the contributions will extend the life of Four Corners by five years as suggested in the PFM, they would amount to a “covered investment” that would need to comply with the EPS. Yet as SCE acknowledges, “[a]ll existing coal plants, including Four Corners, are unable to meet the EPS emission standards.”¹⁴

SCE therefore requests that the Commission modify D.07-01-039 to permit it to make the capital investments required by the Four Corners operating agreement and co-tenancy agreement. According to SCE, such a modification would be consistent with the Decision’s intent not to “subject[] the millions of dollars in the LSE’s already-built facilities to a standard that is being developed to prevent backsliding in LSE decisions for future investments.”¹⁵ Because the Four Corners is jointly owned with third parties, and the capital improvements are required pursuant to preexisting agreements with those parties, SCE argues that it has little “discretion or choice” regarding whether or not to make the improvements: “strict default provisions...will be triggered if SCE fails to make required financial contributions.”¹⁶

¹⁰ PFM, p. 9.

¹¹ PFM, p. 8; and Genao Declaration, Exhibit C, SCE 2009 General Rate Case, Volume 7 – Coal Capital Expenditures, Chapter X, p. 3:11-12.

¹² SCE distributed its testimony in November 2007. Hearings are currently set for May 2008.

¹³ PFM, p. 4.

¹⁴ PFM, Genao Declaration, Exhibit C, SCE 2009 General Rate Case, Volume 7 – Coal Capital Expenditures, Chapter X, p.2:16-17.

¹⁵ PFM, p. 7, citing D.07-01-039, Finding of Fact 220(c), p. 263.

¹⁶ PFM, p. 8.

SCE did not submit the complete agreements that govern Four Corners, so it is unclear whether there are other options short of default given California's newly enacted EPS.¹⁷ Assuming SCE has no options short of defaulting on its Four Corners agreements, DRA supports the exemption of Four Corners from the EPS standard based on SCE's contractual obligations to fund ongoing capital expenditures that are deemed necessary to "assure reliable, safe, and legally compliant operations"¹⁸ through the remaining term of its current co-tenancy agreement for Four Corners.

B. DRA opposes the requested generic exemption for all investments made pursuant to contracts entered into prior to January 25, 2007.

SCE requests that the Commission revise Attachment 7 to the Decision to exclude from the definition of "Covered Procurements" all "financial contributions required by existing contractual agreements (effective prior to January 29, 2007) that would otherwise trigger the EPS."¹⁹ SCE's PFM does not warrant a generic exemption for all existing contractual agreements. The Decision rejected SCE's proposal for generic relief based on SCE's claim regarding Four Corners. Instead, the Decision directed SCE to separately request appropriate relief in order to comply with its contractual obligations with Four Corners.

In its opening comments to the Proposed Decision, SCE argues that the definition of "covered procurements" might result in unconstitutionally impairing a contract that it has with its co-tenants concerning maintenance of the Four Corners Project. SCE does not state that the EPS rule as currently written will prevent it from complying with its contractual obligations, only that it may. Nor does it provide us with a copy of the contract. In short, this record does not establish whether the EPS rule as written will make it impossible for SCE to comply with its contractual

¹⁷ The Commission might consider reviewing complete copies of the contract to determine whether options short of default exist in the case of a law that makes compliance with the terms of the Four Corners agreements impossible.

¹⁸ PFM, Genao Declaration, Exhibit C, SCE 2009 General Rate Case, Volume 7 – Coal Capital Expenditures, Chapter X, p. 3:11-12.

¹⁹ PFM, pp. 8-9.

obligations, and if so whether that would constitute an unconstitutional impairment of contract. Furthermore, SCE's proposed solution is to grant generic relief, rather than relief for the specific plant where SCE says it has problems. Accordingly, we see no reason to grant SCE's requested relief at this time. If SCE anticipates that the EPS will prevent it from complying with its contractual obligations at Four Corners, it should file an application or petition for modification, together with adequate supporting information, documentation, and analysis, and request appropriate relief.²⁰

There is nothing on the record that supports the need for generic relief to exempt LSEs with existing contractual obligations from the EPS rules. Moreover, the Decision has already provisioned for reliability and cost exemptions on a case-by-case basis and emphasized that the Commission's consideration of such exemptions comes with a heavy burden of proof on the LSE.²¹

It is unclear that there are any other LSE's who face contractual obligations similar to those alleged by SCE. If it appears likely that the situation may arise again, DRA recommends that the Commission modify its Decision to allow requests for exemptions from the EPS based on prior contractual agreements to be reviewed on a case-by-case basis.

III. CONCLUSION

Assuming SCE has no options short of defaulting on its Four Corners agreements, DRA supports the exemption of Four Corners from the EPS standard. The Commission should not, however, establish a blanket exemption from the EPS for financial contributions made pursuant to existing contractual agreements. Instead, the Commission should determine each case on its own merits. If it appears likely that this situation will arise again, the Commission may want to consider providing for review of such requests by an advice letter process.

²⁰ D.07-01-039, p. 45.

²¹ *Id.*, pp. 101-102.

Respectfully submitted,

/s/ DIANA L. LEE

DIANA L. LEE

Staff Counsel

Attorney for the Division of Ratepayer
Advocates

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Fax: (415) 70-2262
Phone: (415) 703-4342

February 27, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of “**RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES TO PETITION OF SOUTHERN CALIFORNIA EDISON COMPANY FOR MODIFICATION OF DECISION 07-01-039**” in **R.06-04-009** by using the following service:

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Executed on **February 27, 2008** at San Francisco, California.

/s/ JANET V. ALVIAR

Janet V. Alviar

N O T I C E

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Service List R.06-04-009

Audra.Hartmann@Dynergy.com;
Betty.Seto@kema.com;
Bob.Lucas@calobby.com;
C_Marnay@lbl.gov;
Cynthia.A.Fonner@constellation.com;
Dan.adler@calcef.org;
Diane_Fellman@fpl.com;
ELL5@pge.com;
GXL2@pge.com;
GloriaB@anzaelectric.org;
HYao@SempraUtilities.com;
JDF1@PGE.COM;
Jairam.gopal@sce.com;
JerryL@abag.ca.gov;
Joe.paul@dynergy.com;
Kathryn.Wig@nrgenergy.com;
Laura.Genao@sce.com;
Lorraine.Paskett@ladwp.com;
Mike@alpinenaturalgas.com;
Philip.H.Carver@state.or.us;
RHHJ@pge.com;
Robert.Rozanski@ladwp.com;
S1L7@pge.com;
SEHC@pge.com;
Sandra.ely@state.nm.us;
THAMILTONS@CHARTER.NET;
Tom.Elgie@powerex.com;
UHelman@caiso.com;
abb@eslawfirm.com;
abonds@thelen.com;
achang@nrdc.org;
adamb@greenlining.org;
aeg@cpuc.ca.gov;
agc@cpuc.ca.gov;
agrimaldi@mckennalong.com;
ahendrickson@commerceenergy.com;
aimee.barnes@ecosecurities.com;
ajkatz@mwe.com;
akbar.jazayeri@sce.com;
akelly@climatetrust.org;
alan.comnes@nrgenergy.com;
aldyn.hoekstra@paceglobal.com;
alex.kang@itron.com;
alho@pge.com;
amber@ethree.com;
andrew.bradford@constellation.com;
andrew.mcallister@energycenter.org;
andy.vanhorn@vhcenergy.com;
anita.hart@swgas.com;
annabelle.malins@fco.gov.uk;
apak@sempraglobal.com;
arno@recurrentenergy.com;
atrial@semptra.com;
atrowbridge@daycartermurphy.com;
aweller@sel.com;
ayk@cpuc.ca.gov;
bbaker@summitblue.com;
bbc@cpuc.ca.gov;
bbebe@smud.org;
bblevins@energy.state.ca.us;
bcragg@goodinmacbride.com;
bdicapo@caiso.com;
bernardo@braunlegal.com;
beth@beth411.com;
bill.chen@constellation.com;
bill.schrand@swgas.com;
bjeider@ci.burbank.ca.us;
bjl@bry.com;
bjones@mjb Bradley.com;
bkc7@pge.com;
blm@cpuc.ca.gov;
bmcc@mccarthyllaw.com;
bmccquown@reliant.com;
bpotts@foley.com;
bpurewal@water.ca.gov;
brabe@umich.edu;
brbarkovich@earthlink.net;
brbc@pge.com;

brenda.lemay@horizonwind.com;
burtraw@rff.org;
bushinskyj@pewclimate.org;
bwallerstein@aquadm.gov;
bwetstone@hotmail.com;
cadams@covantaenergy.com;
californiadockets@pacificorp.com;
carla.peterman@gmail.com;
carter@ieta.org;
case.admin@sce.com;
cathy.karlstad@sce.com;
cbaskette@enernoc.com;
cbreidenich@yahoo.com;
cchen@ucusa.org;
cem@newsdata.com;
cf1@cpuc.ca.gov;
cft@cpuc.ca.gov;
charlie.blair@delta-ee.com;
chilen@sppc.com;
cjw5@pge.com;
ckmitchell1@sbcglobal.net;
ckrupka@mwe.com;
clarence.binninger@doj.ca.gov;
clark.bernier@rlw.com;
clyde.murley@comcast.net;
cmkehrrein@ems-ca.com;
colin.petheram@att.com;
cpe@cpuc.ca.gov;
cpechman@powereconomics.com;
cswoolums@midamerican.com;
curt.barry@iwpnews.com;
curtis.kebler@gs.com;
cweddington@commerceenergy.com;
cynthia.schultz@pacificorp.com;
daking@semptra.com;
danskopec@gmail.com;
dansvec@hdo.net;
dave@ppallc.com;
david.zonana@doj.ca.gov;
david@branchcomb.com;
david@nemtzw.com;
davidreynolds@ncpa.com;
dbrooks@nevp.com;
deborah.slone@doj.ca.gov;
dehling@klng.com;
derek@climaterestory.org;
dhecht@semptratading.com;
dhuard@manatt.com;
dietrichlaw2@earthlink.net;
dil@cpuc.ca.gov;
dkk@eslawfirm.com;
dks@cpuc.ca.gov;
dmacmull@water.ca.gov;
dmetz@energy.state.ca.us;
dniehaus@semptrautilities.com;
douglass@energyattorney.com;
dseperas@calpine.com;
dsh@cpuc.ca.gov;
dsoyars@sppc.com;
dtibbs@aes4u.com;
dwang@nrdc.org;
dwood8@cox.net;
dws@r-c-s-inc.com;
e-recipient@caiso.com;
echiang@elementmarkets.com;
edm@cpuc.ca.gov;
edwardoneill@dw.com;
egw@a-klaw.com;
ehadley@reupower.com;
ej_wright@oxy.com;
ek@a-klaw.com;
ekgrubaug@iid.com;
eks@cpuc.ca.gov;
elvine@lbl.gov;
emahlon@ecoact.org;
emello@sppc.com;
epoole@adplaw.com;
etiedemann@kmtg.com;

ewolfe@resero.com;
ez@pointcarbon.com;
farrokh.albuyeh@oati.net;
fiji.george@elpaso.com;
filings@a-klaw.com;
fjs@cpuc.ca.gov;
fstern@summitblue.com;
fwmonier@tid.org;
gbarch@knowledgeinenergy.com;
gblue@enxco.com;
gcollord@arb.ca.gov;
george.hopley@barcap.com;
ghinners@reliant.com;
glw@eslawfirm.com;
gmorris@emf.net;
gpickering@navigantconsulting.com;
gregory.koiser@constellation.com;
grosenblum@caiso.com;
gsmith@adamsbroadwell.com;
harveyederpspc.org@hotmail.com;
hayley@turn.org;
hconlin@water.ca.gov;
hgolub@nixonpeabody.com;
hoerner@redefiningprogress.org;
hurlock@water.ca.gov;
hym@cpuc.ca.gov;
info@calseia.org;
james.keating@bp.com;
janill.richards@doj.ca.gov;
jarmstrong@goodinmacbride.com;
jason.dubchak@niskags.com;
jbf@cpuc.ca.gov;
jbw@slwplc.com;
jchamberlin@strategicenergy.com;
jci@cpuc.ca.gov;
jdh@eslawfirm.com;
jdoll@arb.ca.gov;
jeanne.sole@sfgov.org;
jeffgray@dwt.com;
jen@cnt.org;
jenine.schenk@apses.com;
jennifer.porter@energycenter.org;
jesus.arredondo@nrgenergy.com;
jf2@cpuc.ca.gov;
jgill@caiso.com;
jgreco@terra-genpower.com;
jhahn@covantaenergy.com;
jholtkamp@hollandhart.com;
jimross@r-c-s-inc.com;
jj.prucnal@swgas.com;
jjensen@kirkwood.com;
jk1@cpuc.ca.gov;
jkarp@winston.com;
jkloberdanz@semptrautilities.com;
jlaun@apogee.net;
jleslie@luce.com;
jluckhardt@downeybrand.com;
jm3@cpuc.ca.gov;
jnm@cpuc.ca.gov;
jody_london_consulting@earthlink.net;
john.hughes@sce.com;
johnredding@earthlink.net;
jol@cpuc.ca.gov;
josephhenri@hotmail.com;
joyw@mid.org;
jsanders@caiso.com;
jscancarelli@flk.com;
jsqueri@gmssr.com;
jst@cpuc.ca.gov;
jtp@cpuc.ca.gov;
julie.martin@bp.com;
wiedman@goodinmacbride.com;
jwmctarnaghan@duanemorris.com;
jxa2@pge.com;
karen@klindh.com;
karla.dailey@cityofpaloalto.org;
kbowen@winston.com;
kcolburn@symbioticstrategies.com;

Service List R.06-04-009

kduusel@navigantconsulting.com;
kdw@woodruff-expert-services.com;
keith.mccrea@sablauw.com;
kellie.smith@sen.ca.gov;
kelly.barr@srpnet.com;
ken.alex@doj.ca.gov;
kenneth.swain@navigantconsulting.com;
kerry.hattevik@mirant.com;
kevin.boudreaux@calpine.com;
kfox@wsgr.com;
kgough@calpine.com;
kgrenfell@nrdc.org;
kgriffin@energy.state.ca.us;
kjinovation@earthlink.net;
kjsimonsen@ems-ca.com;
kkhoja@thelenreid.com;
klatt@energyattorney.com;
kmills@cfbf.com;
kmkiener@fox.net;
kowalewska@calpine.com;
krd@cpuc.ca.gov;
kyle.l.davis@pacificorp.com;
kyle.silon@ecosecurities.com;
kyle_boudreaux@fpl.com;
lars@resource-solutions.org;
lcottle@winston.com;
ldecario@energy.state.ca.us;
leilani.johnson@ladwp.com;
liddell@energyattorney.com;
lisa.c.schwartz@state.or.us;
lisa_weinzimer@platts.com;
llorenz@semprautilities.com;
llund@commerceenergy.com;
lmh@eslawfirm.com;
lpark@navigantconsulting.com;
lrdevanna-ri@cleanenergysystems.com;
lrm@cpuc.ca.gov;
lschavrien@semprautilities.com;
litenhope@energy.state.ca.us;
litt@cpuc.ca.gov;
marcel@turn.org;
marcie.milner@shell.com;
mary.lynn@constellation.com;
mclaughlin@braunlegal.com;
mday@goodinmacbride.com;
mdjoseph@adamsbroadwell.com;
mflorio@turn.org;
mgarcia@arb.ca.gov;
mgillette@enemroc.com;
mhyams@swater.org;
mjd@cpuc.ca.gov;
mmattes@nossaman.com;
mmazur@3phasesRenewables.com;
mona@landsiteinc.net;
monica.schwebs@bingham.com;
mpa@a-klaw.com;
mpyor@energy.state.ca.us;
mrw@mrwassoc.com;
mscheibl@arb.ca.gov;
mwaugh@arb.ca.gov;
nenbar@energy-insights.com;
ner@cpuc.ca.gov;
nes@a-klaw.com;
nlenssen@energy-insights.com;
norman.furuta@navy.mil;
notice@psrec.coop;
npedersen@hanmor.com;
nsuetake@turn.org;
ntronaas@energy.state.ca.us;
nwhang@manatt.com;
obartho@smud.org;
obystrom@cera.com;
ofoote@hkcf-law.com;
pbarthol@energy.state.ca.us;
pburmich@arb.ca.gov;
pduvair@energy.state.ca.us;
pepper@cleanpowermarkets.com;
phanschen@mofo.com;
philm@scdenergy.com;
pjazayeri@stroock.com;

ppettingill@caiso.com;
psp@cpuc.ca.gov;
pssed@adelphia.net;
pstoner@lgc.org;
pthompson@summitblue.com;
pvallen@thelen.com;
pw1@cpuc.ca.gov;
pzs@cpuc.ca.gov;
rachel@ceert.org;
ralph.dennis@constellation.com;
ram@cpuc.ca.gov;
randy.howard@ladwp.com;
randy.sable@swgas.com;
rapcowart@aol.com;
ray.welch@navigantconsulting.com;
rhelgeson@scppa.org;
rhwisner@lbl.gov;
richards@mid.org;
rick_noger@praxair.com;
rita@ritanortonconsulting.com;
rkeen@manatt.com;
rkmoore@gswater.com;
rmccann@umich.edu;
rmiller@energy.state.ca.us;
rmm@cpuc.ca.gov;
rmorillo@ci.burbank.ca.us;
robert.pettinato@ladwp.com;
roger.montgomery@swgas.com;
rogerv@mid.org;
ron.deaton@ladwp.com;
rprince@semprautilities.com;
rreinhard@mofo.com;
rtaylor@srpnet.com;
rsa@a-klaw.com;
rschmidt@bartlells.com;
rsmutny-jones@caiso.com;
rwinthrop@pilotpowergroup.com;
ryan.flynn@pacificorp.com;
saeed.farrokhpay@ferc.gov;
samuel.r.sadler@state.or.us;
sandra.carolina@swgas.com;
sas@a-klaw.com;
sasteriadis@apx.com;
sbeatty@cwclaw.com;
sberlin@mccarthyllaw.com;
sbeserra@sbcglobal.net;
scarter@nrdc.org;
scohn@smud.org;
scott.tomashefsky@ncpa.com;
scottanders@sandiego.edu;
scr@cpuc.ca.gov;
sdhilton@stoel.com;
sellis@fypower.org;
sendo@ci.pasadena.ca.us;
sephra.ninow@energycenter.org;
sgm@cpuc.ca.gov;
slins@ci.glendale.ca.us;
sls@a-klaw.com;
smichel@westernresources.org;
smindel@knowledgeinenergy.com;
smk@cpuc.ca.gov;
snewsom@semprautilities.com;
spauker@wsgr.com;
sscb@pge.com;
ssmyers@att.net;
steve.koerner@elpaso.com;
steve@schiller.com;
stevek@kromer.com;
steven.huhman@morganstanley.com;
steven.schleimer@barclayscapital.com;
steven@iepa.com;
steven@lipmanconsulting.com;
steven@moss.net;
svn@cpuc.ca.gov;
svongdeuane@semprasolutions.com;
svs6@pge.com;
tam@cpuc.ca.gov;
tburke@swater.org;
tcarlson@reliant.com;
tcx@cpuc.ca.gov;

tdarton@pilotpowergroup.com;
tdillard@sppc.com;
thunt@cecmil.org;
tiffany.rau@bp.com;
tim.hemig@nrgenergy.com;
todil@mckennalong.com;
tomb@crossborderenergy.com;
tomk@mid.org;
trdill@westernhubs.com;
troberts@sempra.com;
vb@pointcarbon.com;
vitaly.lee@aes.com;
vjw3@pge.com;
vprabhakaran@goodinmacbride.com;
vwelch@environmentaldefense.org;
wbooth@booth-law.com;
westgas@aol.com;
william.tomlinson@elpaso.com;
wsm@cpuc.ca.gov;
wtasat@arb.ca.gov;
www@eslawfirm.com;
wynne@braunlegal.com;
ygross@sempraglobal.com;
zaiontj@bp.com;